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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA, ) No. CR 18-179 EMC  
13 Plaintiff, )  
14 v. ) STIPULATION AND [PROPOSED]  
15 CHRISHAWN BEAL ET AL., ) ORDER CONTINUING MATTER AND  
16 Defendants. ) EXCLUDING TIME UNDER THE  
17 ) SPEEDY TRIAL ACT  
17 ) Date: June 20, 2018, to August 7, 2018  
17 )

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18 The parties appeared before the Honorable Edward M. Chen on June 20, 2018, for a status  
19 conference. The government represented that it has produced more than 100 pages of discovery to the  
20 defendants. The government also represented that it would be producing additional discovery,  
21 specifically, body worn camera footage, photographs, search warrants, and additional items of evidence.  
22 The defense represented that would need time to review and analyze discovery. Accordingly, the parties  
23 requested, and the Court granted, a continuance until August 7, 2018, for further status. The parties also  
24 stipulated, and the Court ordered, that time between June 20, 2018, and August 7, 2018, be excluded for  
25 effective preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

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1 The parties further stipulate, and ask the Court to find, that the requested continuance and  
2 exclusion of time are in the interests of justice and outweigh the best interest of the public and the  
3 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

5 || SO STIPULATED.

6 | DATED: August 7, 2018

ALEX G. TSE  
United States Attorney

/s/  
CHRISTIAAN H. HIGHSMITH  
Assistant United States Attorney

10 | DATED: August 7, 2018

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/s/  
MARTIN SABELLI  
Counsel for Defendant Chrishawn Beal

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/s/  
DENA MARIE YOUNG  
Counsel for Defendant Ledarrell Javon Crockett

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/s/  
ADAM PENNELL  
Counsel for Defendant Ledarrell Javon Crockett

/s/  
KENNETH WINE  
Counsel for Defendant Melvin Lamont Corbin

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/s/  
**ROBERT WAGGENER**  
Counsel for Defendant Nakia Jones

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/s/  
SARA ELLEN RIEF  
Counsel for Defendant Siddiq Jafar Abdullah

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/s/  
**MICHAEL STEPANIAN**  
Counsel for Defendant Romello Shamer Jones

/s/

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2 [PROPOSED] ORDER

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4 For the reasons stated, this matter is continued until August 7, 2018 at 10:00 a.m. for a status  
5 conference. The time between June 20, 2018, and August 7, 2018, is excluded from the running of the  
6 speedy trial clock for effective preparation of counsel under 18 U.S.C. § 3161(h)(7)(B)(iv). Failure to  
7 grant the continuance would deny the defendant's counsel the reasonable time necessary to prepare,  
8 taking into account the exercise of due diligence.

9 IT IS SO ORDERED.

10 DATED: 8/9/2018

